IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Reading Division

IN RE: ANN KRUEGER-RUFF and DUANE F. RUFF U.S. Bank National Association, as Trustee for the C-BASS Mortgage Loan Asset-Backed Certificates, Series 2007-SL1, Movant	Case No. 21-10287-pmm Chapter 13
vs. ANN KRUEGER-RUFF and DUANE F. RUFF, Debtor	11 U.S.C. §362

OBJECTION TO CONFIRMATION OF DEBTORS' CHAPTER 13 PLAN

U.S. Bank National Association, as Trustee for the C-BASS Mortgage Loan Asset-Backed Certificates, Series 2007-SL1 ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtors' Chapter 13 Plan* (Doc 13), and states as follows:

- 1. The Debtors filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on February 5, 2021.
- 2. Movant holds a security interest in the Debtor(s)' real property located at 16 Dare Ln, Emmaus, PA 19465 (the "Property"), by virtue of a Mortgage.
- 3. The Debtors filed a Chapter 13 Plan (the "Plan") on February 14, 2021 (Doc 13), to which Movant files this objection.
 - 4. Movant is in the process of drafting a total debt Proof of Claim.
 - 5. The Plan proposes to continue to pay Movant directly. However, it should be noted

that the loan matures in September 2021. The Debtor's Plan needs to be amended to list the full total debt arrears plus pay all the taxes and insurance.

WHEREFORE, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/ Andrew Spivack
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IN RE:
ANN KRUEGER-RUFF and DUANE F. RUFF

Case No. 21-10287-pmm Chapter 13

U.S. Bank National Association, as Trustee for the C-BASS Mortgage Loan Asset-Backed Certificates, Series 2007-SL1,

Movant

VS.

ANN KRUEGER-RUFF and DUANE F. RUFF, Debtor

11 U.S.C. §362

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Objection To Confirmation Of Debtors' Chapter 13 Plan has been electronically served or mailed, postage prepaid on March 2, 2021 to the following:

ANN KRUEGER-RUFF 5776 KEITH LN EMMAUS, PA 18049-5047

DUANE F. RUFF 5776 KEITH LN EMMAUS, PA 18049-5047

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Scott F. Waterman, Bankruptcy Trustee Chapter 13 Trustee 2901 St. Lawrence Ave, Suite 100 Reading, PA 19606 U.S. Trustee United States Trustee Office of United States Trustee 200 Chestnut Street Suite 502 Philadelphia, PA 19106

/s/ Andrew Spivack

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